

**David A. Evans**

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**From:** David A. Evans  
**Sent:** Monday, February 01, 2016 2:05 PM  
**To:** 'Clark clark'  
**Subject:** RE: Western World v. PCC

Will not. Sorry for the confusion.

Dave

David A. Evans

Selvin Wraith Halman LLP  
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**From:** Clark clark [<mailto:clarkgaren@msn.com>]  
**Sent:** Monday, February 01, 2016 2:04 PM  
**To:** David A. Evans  
**Subject:** RE: Western World v. PCC

Do you mean you WILL require or that you WILL NOT require?

Clark

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**From:** [devans@selvinwraith.com](mailto:devans@selvinwraith.com)  
**To:** [clarkgaren@msn.com](mailto:clarkgaren@msn.com)  
**Subject:** Western World v. PCC  
**Date:** Mon, 1 Feb 2016 22:00:34 +0000

Clark:

This will confirm our several meet and confer discussions, including a telephonic discussion on January 28, 2016, in which you, on behalf of Professional Collection Consultants, agreed to withdraw all claims against Western World Insurance Company arising from, concerning or otherwise involving claims made by Beblen Pole and Lisa McCann as alleged in PCC's Answer and Counter-Claim in this matter.

As a consequence of PCC's voluntary waiver of claims pertaining to Pole and McCann, Western World will require PCC to produce documents or provide oral testimony concerning the Pole and

McCann claims in the deposition of PCC's person most qualified, currently scheduled for February 3, 2016.

Western World reserves the right to pursue all available remedies, including resuming the deposition of PCC's person most qualified or evidentiary preclusion if PCC raises the Pole or McCann claims as a defense, claim or in any other manner against Western World hereafter.

Thank you for your professional courtesy and cooperation. If any of the foregoing does not comport with your understanding of PCC's agreement to withdraw all claims against Western World involving the Pole and McCann claims, please contact me immediately.

Best regards,

David A. Evans

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